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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 KEVIN MEAGHER on behalf of himself and
 10 REBECCA DAWSON on behalf of
 themselves and all other similarly situated
 individuals,

11 Plaintiffs,

12 v.

13 KTC HOLDING COMPANY f/k/a THE
 14 KINGDOM TRUST COMPANY,

15 Defendant.

16 CASE NO. 2:24-cv-01630-CDC-MDC

17 **STIPULATION AND PROPOSED ORDER**
TO EXTEND TIME TO RESPOND TO
COMPLAINT

18 **(THIRD REQUEST)**

19 Plaintiffs KEVIN MEAGHER and REBECCA DAWSON (“Plaintiffs”) and
 20 Defendant KTC HOLDING COMPANY, formerly known as THE KINGDOM TRUST
 COMPANY (“Defendant,” and together with Plaintiffs, the “Parties”), by and through their
 respective counsel, and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby
 stipulate and agree as follows:

21 WHEREAS, Plaintiffs filed their First Amended Complaint on November 8, 2024
 22 (ECF No. 13);

23 WHEREAS, on January 6, 2025, this Court entered an order granting the Parties’
 24 second joint stipulation to extend the time to respond to the First Amended Complaint (ECF
 25 No. 15), allowing the Parties to engage in settlement discussions, making Defendant’s
 26 response deadline February 21, 2025;

27 WHEREAS, the Parties continue to diligently engage in settlement negotiations in
 28 good faith and request additional time to explore potential early resolution of this matter.

1 The Parties have made significant progress in settlement discussions and are optimistic that
 2 an agreement can be reached with additional time;

3 WHEREAS, the Parties have agreed to an extension of time for Defendant to
 4 respond to the First Amended Complaint, namely, April 7, 2025, to allow the Parties to
 5 continue ongoing settlement discussions;

6 NOW, THEREFORE, in consideration of the foregoing, the Parties hereby
 7 STIPULATE and AGREE that the deadline for Defendant to respond to the amended
 8 complaint is April 7, 2025.

9 The Parties represent this stipulation is made in good faith and not for the purposes
 10 of delay.

11 **IT IS SO STIPULATED.**

12 Dated this 20th day of February, 2025.

13 /s/ Eric W. Swanis

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GREENBERG TRAURIG, LLP
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Counsel for Defendant

16 Dated this 20th day of February, 2025.

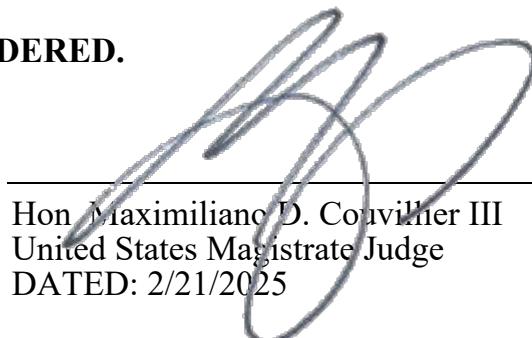
17 /s/ Kennedy M. Brian

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Counsel for Plaintiffs

21 **IT IS SO ORDERED.**

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 Hon. Maximiliano D. Couviller III
 United States Magistrate Judge
 DATED: 2/21/2025